

1 TORY M. PANKOPF (SBN 7477)
2 **TORY M. PANKOPF, LTD.**
3 3500 Lakeside Court, Suite 211
4 Reno, Nevada 89509
5 Telephone: (775) 384-6956
6 Facsimile: (775) 384-6958
7 Attorney for Defendant,
8 RODNEY COFFMAN

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11
12 NATIONSTAR MORTGAGE, LLC, dba
13 MR. COOPER

14 Plaintiff,

15 v.

16 STONEFIELD HOMEOWNERS
ASSOCIATION and RODNEY COFFMAN,

17 Defendants.

CASE NO: 3:17-cv-00627-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
RODNEY COFFMAN, TO FILE REPLY
TO PLAINTIFF'S OPPOSITION TO
MOTION TO DISMISS COMPLAINT,
ALTERNATIVELY, SUMMARY
JUDGMENT**

(FIRST REQUEST)

18
19
20
21 Defendant, RODNEY COFFMAN ("Defendant" or "Coffman") by and through his
22 attorney, Tory M. Pankopf, of the Law Offices of Tory M. Pankopf, Ltd., and Plaintiff,
23 NATIONSTAR MORTGAGE, LLC ("Plaintiff" or "Nationstar"), stipulate to an extension of
24 Coffman's time to respond to Nationstar's opposition to his motion to dismiss the complaint or
25 alternatively, summary judgment [ECF No. 21].
26
27
28

RECITALS

1. Coffman filed its motion to dismiss complaint, alternatively, summary judgment on December 20, 2017 [ECF No. 13];

2. Pursuant to two orders on the parties' stipulations to extend time, Nationstar's response was filed on January 31, 2017 [ECF 17 and 20];

3. Coffman's reply is due today, February 7, 2018. The undersigned counsel of record for Coffman is, unexpectedly, moving his law office this week;

4. Counsel for Coffman requests the extension to allow time to move his law office and have a meaningful review of Nationstar's opposition to his motion, provide adequate time to draft a response, and allow sufficient time for client review and approval of the response before filing;

5. Accordingly, counsel for Coffman requests a brief extension through February 21, 2018, in which to file his reply;

6. This is 's first request for an extension of time to file a response to Coffman's motion;

7. This stipulation is made in good faith and not for purposes of delaying the ultimate resolution of this case, and the parties will not be prejudiced by this request for extension of time.

DATED this 7th day of January, 2018.

AKERMAN LLP

TORY M. PANKOPF, LTD.

/s/

/s/

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
DONNA WITTIG, ESQ.
Nevada Bar No. 11015
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134


TORY M. PANKOPF, ESQ.
Nevada Bar No. 7477
3500 Lakeside Court, Suite 211.
Reno, Nevada 89509

Attorneys for Defendant Rodney Coffman

*Attorneys for Plaintiff The Bank of New York
Mellon f/k/a The Bank of New York*

IT IS SO ORDERED.

Dated: February 8, 2018


U.S. District Judge

1 TORY M. PANKOPF (SBN 7477)
2 **TORY M. PANKOPF, LTD.**
3 3500 Lakeside Court, Suite 211
4 Reno, Nevada 89509
5 Telephone: (775) 384-6956
6 Facsimile: (775) 384-6958
7 Attorney for Defendant,
8 RODNEY COFFMAN

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 NATIONSTAR MORTGAGE, LLC, dba
12 MR. COOPER

13 Plaintiff,

14 v.

15 STONEFIELD HOMEOWNERS
16 ASSOCIATION and RODNEY COFFMAN,

17 Defendants.

CASE NO: 3:17-cv-00627-MMD-WGC

**DECLARATION OF TORY M.
PANKOPF IN SUPPORT OF TARDY
FILING OF EXTENSION**

18 I, TORY M. PANKOPF, declare and state:

- 19 1. I am the attorney of record for the Plaintiff in the above entitled action. If called as a
20 witness, I could competently testify as to all of the matters contained herein. All of the facts set
21 forth in this declaration are based on my own personal knowledge.
- 22 2. I obtained consent to the extension from plaintiff's counsel yesterday morning. However,
23 my internet access to my office was shut down by the manager of the office I was subletting and
24 refused to turn it on. I was set to pack-up my office and move this weekend. But, as a
25 consequence of my need to have access to the internet to practice, I had to pack-up my office that
26 day and set-up at my new office. I did not have my computer up and running until about 11:30
27 pm last night. At which time I sent counsel the stipulation and order for her review. She emailed
28

1 me her authorization this morning at about 6:30 am and I saw it about 7:00. Thereafter, I filed the
2 stipulation.

3 I declare, under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5
6 DATED: This 8th day of February, 2018.

7 ***TORY M. PANKOPF LTD***

8
9 By: /S/ TORY M. PANKOPF
10 TORY M. PANKOPF, ESQ.
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28